Federal Operating Permit
Article 1

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1 of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-300 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name:	Eastern Shore Composites, LLC.
Facility Name:	Eastern Shore Composites, LLC.
Facility Location:	20508 Webster Rd. Cheriton, VA 23316
Registration Number:	61404
Permit Number:	TRO-61404

February 1, 2006
Effective Date

January 31, 2011
Expiration Date

January 4, 2006
Signature Date

(for)

Robert G. Burnley
Director, Department of Environmental Quality

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1. Facility Information

Permittee
Eastern Shore Composites, LLC.
20508 Webster Rd.
Cheriton, VA 23316

Responsible Official
Todd Schaubach
President

Facility
Eastern Shore Composites, LLC.
20508 Webster Rd.
Cheriton, VA 23316

Contact Person
Andrea Arredondo
Earth Compliance Solutions
Consultant
757-880-6818

County-Plant Identification Number: 51-131-00023

Facility Description: NAICS 336612/SIC 3083, 3732, 4493 – This facility was built and permitted to manufacture fiberglass boats. The facility has not secured any large contracts to build fiberglass boats, so they are primarily doing fiberglass boat repair work, building fiberglass fish tanks, building fiberglass medical waste containers and repairing fiberglass tomato gondolas. The facility is subject to the boat manufacturing MACT (Subpart WWWW) and the reinforced plastics MACT (Subpart VVVV) because the minor NSR permit allows the facility to emit greater than 10 tons/yr of Styrene, which is a Hazardous Air Pollutant (HAP). They are subject to the Title V regulation because they are permitted to be a major source of HAP.

2. Emission Units

Equipment to be operated consists of:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Gelcoat Application Process							
01-02	S1 or S2	Venus Internal Mix Flow Coater guns.	30 gal/hr	Screen filters	PC1 & PC2	Styrene, Methyl Methacrylate.	7/21/04
Flow chopping process							
03-07	S2	Magnum VPR-1000 Impinged Nozzle Flow Chopper guns	60 gal/hr	Screen filters	PC2	Styrene, Methyl Methacrylate	7/21/04
08	S2	Manual patching and Adhesive applications	NA	Screen filters	PC2	Styrene, Methyl Methacrylate	7/21/04
Sanding And Grinding							
09	S3	Sanding and Grinding – power and manual	NA	Screen filters-	PC3	PM/PM10	7/21/04

*The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

3. Process Equipment Requirements - All Emission Units

A. Limitations – MACT Standards - Boat Manufacturing Operations - Subpart VVVV

3.A.1. **Emission Limits -** - Annual HAP emissions from the use of production resin, pigmented gel coat, clear gel coat, tooling resin and tooling gel coat shall not exceed the following limit:

Equation A:

HAP Limit $= [46(M_R) + 159(M_{PG}) + 291(M_{CG}) + 54(M_{TR}) + 214(M_{TG})]$

Where:

HAP Limit = total allowable organic HAP that can be emitted from the open molding operations, kilograms

M_R = mass of production resin used in the past 12 months, excluding any exempt materials as listed in 63.5698(d)(1)-(3), megagrams

M_{PG} = mass of pigmented gel coat used in the past 12 months, excluding any exempt materials as listed in 63.5698(d)(1)-(3), megagrams

M_{CG} = mass of clear gel coat used in the past 12 months, excluding any exempt materials as listed in 63.5698(d)(1)-(3), megagrams

M_{TR} = mass of tooling resin used in the past 12 months, excluding any exempt materials as listed in 63.5698(d)(1)-(3), megagrams

M_{TG} = mass of tooling gel coat used in the past 12 months, excluding any exempt materials as listed in 63.5698(d)(1)-(3), megagrams

Compliance with this condition shall be demonstrated on a 12-month rolling average and shall be determined at the end of each calendar month (after the first 12 months) by using the following equation:

Equation B:

HAP emissions $= [(PV_R)(M_R) + (PV_{PG})(M_{PG}) + (PV_{CG})(M_{CG}) + (PV_{TR})(M_{TR}) + (PV_{TG})(M_{TG})]$

Where:

HAP emissions = Organic HAP emissions calculated using MACT point values for each operation included in the average, kilograms

PV_R = Weighted-average MACT model point value for production resin used in the past 12 months, kilograms per megagram

M_R = Mass of production resin used in the past 12 months, megagrams

PV_{PG} = Weighted-average MACT model point value for pigmented gel coat used in the past 12 months, kilograms per megagram

M_{PG} = Mass of pigmented gel coat used in the past 12 months, megagrams

PV_{CG} = Weighted-average MACT model point value for clear gel coat used in the past 12 months, kilograms per megagram

M_{CG} = Mass of clear gel coat used in the past 12 months, megagrams

PV_{TR} = Weighted-average MACT model point value for tooling resin used in the past 12 months, kilograms per megagram

M_{TR} = Mass of tooling resin used in the past 12 months, megagrams

PV_{TG} = Weighted-average MACT model point value for tooling gel coat used in the past 12 months, kilograms per megagram

M_{TG} = Mass of tooling gel coat used in the past 12 months, megagrams

At the end of every month use the following equation to calculate the weighted-average MACT model point value for each open molding resin and gel coat operation included in the average:

Equation C:

$$PV_{OP} = \frac{\sum_{i=1}^{n}(M_i PV_i)}{\sum_{i-1}^{n}(M_i)}$$

Where:

PV_{OP} = weighted-average MACT model point value for each open molding operation (PV_R, PV_{PG}, PV_{CG}, PV_{TR}, PV_{TG}) included in the average, kilograms of HAP per megagram of material applied.

M_i = mass of resin or gel coat *i* used within an operation in the past 12 months, megagrams

n = number of different open molding resins and gel coats used within an operation in the past 12 months.

PV_I = the MACT model point value for resin or gel coat *i* used within an operation in the past 12 months, kilograms of HAP per megagram of material applied.

See Table 3 of 40 CFR Subpart VVVV to calculate the MACT model point values (PV_i) for each resin and gel coat used in each operation in the past 12 months.

If the HAP emissions calculated in Equation B are less than the HAP emissions limit calculated in Equation A, then you are in compliance.
(9 VAC 5-50-260, 9 VAC 5-60-100 (40 CFR Part 63 Subpart VVVV), 9 VAC 5-80-110 and Condition 4 of the 7/21/04 permit)

3.A.2. Resin and Gel Coat Mixing Operations -

a. All resin and gel coat mixing containers with a capacity equal to or greater than 208 liters (55 gal), including those used for on-site mixing of putties and polyputties, must have a cover with no visible gaps in place at all times, except as provided in paragraph (b) below.

b. The work practice standard in paragraph (a) of this condition does not apply when material is being manually added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

c. To demonstrate compliance with the work practice standard in paragraph (a) of this condition, all mixing containers subject to this standard must be visually inspected at least once per month. The inspection should ensure that all containers have covers with no visible gaps between the cover and the container, or between the cover and equipment passing through the cover.

d. Records must be kept of which mixing containers are subject to this standard and the results of the inspections, including a description of any repairs or corrective actions taken.

(9 VAC 5-60-100, 9 VAC 5-80-110 and Condition 5 of the 7/21/04 permit)

3.A.3. Resin and Gel Coat Application Equipment Cleaning Operations

a. For routine flushing of resin and gel coat application equipment (e.g., spray guns, flowcoaters, brushes, rollers, and squeegees), a cleaning solvent that contains no more than 5 percent organic HAP by weight must be used. The organic HAP limit does not apply to removing cured resin or gel coat from application equipment.

b. Drums/buckets used for soaking equipment with cured resin or gelcoat - Storage of organic HAP-containing solvents used for removing cured resin or gel coat must be in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment to be cleaned is placed in or removed from the container. On containers with a capacity greater than 7.6 liters, the distance from the top of the container to the solvent surface must be no less than 0.75 times the diameter of the container. Containers that store organic HAP-containing solvents used for removing cured resin or gel coat are exempt from the requirements of 40 CFR Part 63, Subpart T. Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid.

Compliance shall be demonstrated by:

c. Determining and recording the organic HAP content of the cleaning solvents subject to the standards specified in §63.5734 using the methods specified in §63.5758 of 40 CFR Part 63, Subpart VVVV.

d. If cleaning solvents are recycled on site, documentation from the solvent manufacturer or supplier or a measurement of the organic HAP content of the cleaning solvent as originally obtained from the solvent supplier for demonstrating compliance may be used, subject to the conditions in §63.5758 for demonstrating compliance with organic HAP content limits.

e. At least once per month, visual inspections must be performed on any containers holding organic HAP-containing solvents used for removing cured resin and gel coat to ensure that the containers have covers with no visible gaps. Keep records of the monthly inspections and any repairs made to the covers.

(9 VAC 5-60-100, 9 VAC 5-80-110 and Condition 6 of the 7/21/04 permit)

3.A.4. Carpet and Fabric Adhesive Operations -

a. Carpet and fabric adhesives shall contain no more than 5 percent organic HAP by weight.

b. To demonstrate compliance with the emission limit in paragraph (a) of this condition, determine and record the organic HAP content of the carpet and fabric adhesives using the methods in §63.5758 of 40 CFR Part 63, Subpart VVVV.

(9 VAC 5-60-100, 9 VAC 5-80-110 and Condition 7 of the 7/21/04 permit)

3.A.5. **Requirements by Reference** - Except where this permit is more restrictive than the applicable requirement, the facility shall be operated in compliance with the requirements of 40 CFR Part 63 Subpart VVVV.

(9 VAC 5-60-100, 9 VAC 5-80-110 and Condition 11 of the 7/21/04 permit)

B. Limitations – MACT Standards - Reinforced Plastics Composite Production Operations - Subpart WWWW

3.B.1. Calculating Emissions - Reinforced Plastics Composites Production - Emissions factors are used in 40 CFR 63 Subpart WWWW to determine compliance with certain organic HAP emissions limits in Tables 3 and 5 of Subpart WWWW. You may use the equations in Table 1 of Subpart WWWW to calculate your emissions factors. Equations are available for each open molding operation and centrifugal casting operation and have units of pounds of organic HAP emitted per ton (lb/ton) of resin or gel coat applied. These equations are intended to provide a method for you to demonstrate compliance without the need to conduct a HAP emissions test. You may also use the organic HAP emissions factors calculated using the equations in Table 1 of Subpart WWWW, combined with resin and gel coat use data, to calculate your organic HAP emissions.

(9 VAC 5-50-260, 9 VAC 5-80-110, 9 VAC 5-60-100 (40 CFR Part 63 Subpart WWWW) and Condition 8 of the 7/21/04 permit)

3.B.2. Standards To Be Met - If you have an existing facility that does not have any centrifugal casting or continuous lamination/casting operations, or an existing facility that does have centrifugal casting or continuous lamination/casting operations, but the combination of all centrifugal casting and continuous lamination/casting operations emit less than 100 tpy of HAP, you must meet the annual average organic HAP emissions limits in Table 3 of 40 CFR 63, Subpart WWWW and the work practice standards in Table 4 of 40 CFR Part 63, Subpart WWWW that apply to you.

(9 VAC 5-50-260, 9 VAC 5-80-110, 9 VAC 5-60-100 (40 CFR Part 63 Subpart WWWW) and Condition 9 of the 7/21/04 permit)

3.B.3. Meeting The Standards - You must use one of the following methods in paragraphs (a) through (d) of this section to meet the standards in §63.5805 of 40 CFR Part 63 Subpart WWWW. When you are complying with an emission limit in Tables 3 or 5 of Subpart WWWW, you may use any control method that reduces organic HAP emissions, including reducing resin and gel coat organic HAP content, changing to non-atomized mechanical application, covered curing techniques, and routing part or all of your emissions to an add-on control. The necessary calculations must be completed within 30 days after the end of each month. You may switch between the compliance options in paragraphs (a) through (d) of this section. When you change to an option based on a 12-month rolling average, you must base the average on the previous 12 months of data calculated using the compliance option you are currently using unless you were using the compliant materials option in paragraph (d) of this section. In this case, you must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options.

a. Meeting The Individual Organic HAP Emissions Limits For Each Operation. Demonstrate that you meet the individual organic HAP emissions limits for each open molding operation and for each centrifugal casting operation type in Tables 3, or 5 of Subpart WWWW that apply to you. This is done in two steps. First, determine an organic HAP factor for each individual resin and gel coat, application method, and control method you use in a particular operation. Second, calculate, for each particular operation type, a weighted average of those organic HAP emissions factors based on resin and gel coat use. Your calculated organic HAP emissions factor must either be at or below the applicable organic HAP emissions limit in Tables 3 or 5 of Subpart WWWW based on a 12-month rolling average. Use the procedures described in paragraphs (a)(i) through (iii) of this section to calculate average organic HAP emissions factors for each of your operations.

(i) Calculate your actual organic HAP emissions factor for each different process stream within each operation type. A process stream is defined as each individual combination of resin or gel coat, application technique, and control technique. Process streams within operation types are considered different from each other if any of the following three characteristics vary: the neat resin or neat gel coat plus organic HAP content, the application technique, or the control technique. You must calculate organic HAP emission factors for each different process stream by using the appropriate equations in Table 1 of Subpart WWWW for open molding and for centrifugal casting. If you want to use vapor suppressants to meet the organic HAP emissions limit for open molding, you must determine the vapor suppressant effectiveness by conducting testing according to the procedures specified of Appendix A to Subpart WWWW of 40 CFR Part 63. See Subpart WWWW for add-on control device calculations.

(ii) Calculate your actual operation organic HAP emission factors for the last 12 months for each open molding operation type and for each centrifugal casting operation type by calculating the weighted average of the individual process stream organic HAP emission factors within each respective operation. To do this, sum the product of each individual organic HAP emission factor calculated in paragraph (a)(i) of this section and the amount of neat resin plus and neat gelcoat plus usage that corresponds to the individual factors and divide the numerator by the total amount of neat resin plus and neat gel coat plus used in that operation type. Use Equation 2 of this section to calculate your actual organic HAP emission factor for each open molding operation type and each centrifugal casting operation type.

$$\text{Emission Factor} = \frac{\sum_{i=1}^{n} \left(\text{Actual } EF_i \times Material_i\right)}{\sum_{i=1}^{n} Material_i}$$

Where:

EF = Actual Operation Organic HAP Emissions Factor

EF_i = Actual Process Stream Emission Factor = actual organic HAP emissions factor for process stream *i*, lbs/ton

$Material_i$ = neat resin plus or neat gel coat plus used during the last 12 calendar months for process stream *i,* tons

n = number of process streams where you calculated an organic HAP emissions factor.

(iii) Compare each organic HAP emission factor calculated in paragraph (b)(ii) of this section with its corresponding organic HAP emission limit in Tables 3 or 5 of Subpart WWWW. If all emission factors are equal to or less than their corresponding emission limits, then you are in compliance.

b. **HAP Emissions Factor Averaging Option.** Demonstrate each month that you meet each weighted average of the organic HAP emission limits in Tables 3 or 5 of Subpart WWWW that apply to you. When using this option, you must demonstrate compliance with the weighted average organic HAP emission limit for all your open molding operations, and then separately demonstrate compliance with the weighted average organic HAP emission limit for all your centrifugal casting operations. Open molding operations and centrifugal casting operations may not be averaged with each other.

(i) Calculate the weighted average organic HAP emission limit for all open molding operations and the weighted average organic HAP emission limit for all centrifugal casting operations for your facility for the last 12-month period to determine the organic HAP emission limit you must meet. To do this, multiply the individual organic HAP emission limits in Tables 3 or 5 of Subpart WWWW for each open molding (centrifugal casting) operation type by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each open molding (centrifugal casting) operation type, sum these results, and then divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding (centrifugal casting) over the last 12 months. Use the equation below to calculate the weighted average organic HAP emission limit for all open molding operations and separately for all centrifugal casting operations.

$$\textit{Weighted} \text{ Average Emission Limit} = \frac{\sum_{i=1}^{n} EL_i \times Material_i}{\sum_{i=1}^{n} \text{Material}_i}$$

Where:

EL_i = organic HAP emission limit for operation type i, lbs/ton from Tables 3, 5 or 7 of Subpart WWWW

$Material_i$ = neat resin plus or neat gel coat plus used during the last 12-month period for operation type i, tons

n = number of operations

(ii) Each month calculate your actual weighted average organic HAP emission factor for open molding and centrifugal casting. To do this, multiply your actual open molding (centrifugal casting) operation organic HAP emission factors and the amount of neat resin plus and neat gel coat plus used in each open molding (centrifugal casting) operation type, sum the results, and divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding (centrifugal casting) operations. You must calculate your actual individual HAP emission factors for each operation type as described in paragraphs (a)(1) and (2) of this section. Use the equation below to calculate your actual weighted average organic HAP emission factor.

$$\text{WEF} = \frac{\sum_{i=1}^{n} \left(\text{Actual Operation } EF_i \times Material_i\right)}{\sum_{i=1}^{n} Material_i}$$

Where:

WEF = Actual Weighted Average Organic HAP Emission Factor

Actual Individual EF_I = Actual organic HAP emission factor for operation type i, lbs/ton

$Material_i$ = neat resin plus or neat gel coat plus used during the last 12 calendar months for operation type i, tons

n = number of operations

(iii) Compare the values calculated in paragraphs (b)(1) and (2) of this section. If each 12-month rolling average organic HAP emission factor is less than or equal to the corresponding 12-month rolling average organic HAP emission limit, then you are in compliance.

c. **Multiple Operation Types** - If you have multiple operation types, you may meet the organic HAP emission limit for one operation type, and use the same resin(s) for all operations of that resin type. If you have more than one operation type, you may meet the emission limit for one of those operations, and use the same resin(s) in all other open molding and centrifugal casting operations.

(i) This option is limited to resins of the same type. The resin types for which this option may be used are non-corrosion-resistant, corrosion-resistant and/or high strength, and tooling.

(ii) For any combination of manual resin application, mechanical resin application, filament application, or centrifugal casting, you may elect to meet the organic HAP emission limit for any one of these operations and use that operation's same resin in all of the resin operations listed in this paragraph. Table 7 of Subpart WWWW presents the possible combinations based on a facility selecting the application process that results in the highest allowable organic HAP content resin. If your resin organic HAP content is below the applicable values shown in Table 7 of Subpart WWWW, you are in compliance.

(iii) You may also use a weighted average organic HAP content for each operation described in paragraph c.(ii) of this section. Calculate the weighted average organic HAP content monthly. Use the equation in section a(ii) of this section except substitute organic HAP content for organic HAP emission factor. You are in compliance if the weighted average organic HAP content based on the last 12 months of resin use is less than or equal to the applicable organic HAP contents in Table 7 of Subpart WWWW.

(iv) You may simultaneously use the averaging provisions in paragraph b. of this section to demonstrate compliance for any operations and/or resins you do not include in your compliance demonstrations is paragraphs c.(ii) and (iii) of this section. However, any resins for which you claim compliance under the option in paragraphs c.(ii) and (iii) of this section may not be included in any of the averaging calculations described in paragraphs a. or b. of this section used for resins for which you are not claiming compliance under this option.

d. **HAP Contents** - Use resins and gel coats that do not exceed the maximum organic HAP contents shown in Table 3 of Subpart WWWW.

(9 VAC 5-50-260, 9 VAC 5-80-110, 9 VAC 5-60-100 (40 CFR Part 63 Subpart WWWW) and Condition 10 of the 7/21/04 permit)

3.B.4. **Requirements by Reference -** Except where this permit is more restrictive than the applicable requirement, the facility shall be operated in compliance with the requirements of 40 CFR Part 63 Subpart WWWW.
(9 VAC 5-60-100, 9 VAC 5-80-110 and Condition 12 of the 7/21/04 permit)

C. Limitations – Operating and Emission Limitations

3.C.1. Particulate emissions from the grinding room, the gel coat room and the lay-up area shall be controlled by a filter system. The filter system shall be provided with adequate access for inspection and shall be in operation when any fiberglass sanding, grinding, spraying or lay-up work is taking place.
(9 VAC 5-50-260 and 9 VAC 5-80-110)

3.C.2. **Number of Guns Operating** - No more than three resin guns (including spray guns and choppers) and one gel coater shall be in use at any time.
(9 VAC 5-80-1180, 9 VAC 5-80-110 and Condition 13 of the 7/21/04 permit)

3.C.3. **Throughput** - The throughput of gel coats shall not exceed 38,800 pounds per year, calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-1180, 9 VAC 5-80-110 and Condition 14 of the 7/21/04 permit)

3.C.4. **Throughput** - The throughput of resins shall not exceed 285,000 pounds per year, calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-1180, 9 VAC 5-80-110 and Condition 15 of the 7/21/04 permit)

3.C.5. **Throughput** - The throughput of patching compounds and adhesives shall not exceed 2,610 pounds per year, calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-1180, 9 VAC 5-80-110 and Condition 16 of the 7/21/04 permit)

3.C.6. **Emission Limits** - Emissions from the use of gel coats shall not exceed the limits specified below:

Volatile Organic Compounds	9.7 tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits shall be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in condition number 3.C.3. (9 VAC 5-50-260, 9 VAC 5-50-180, 9 VAC 5-80-110 and Condition 17 of the 7/21/04 permit)

3.C.7. **Emission Limits** - Emissions from the use of resins shall not exceed the limits specified below:

Volatile Organic Compounds	67.0 tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits shall be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in condition number 3.C.4. (9 VAC 5-50-260, 9 VAC 5-50-180, 9 VAC 5-80-110 and Condition 18 of the 7/21/04 permit)

3.C.8. **Emission Limits** - Emissions from the use of patching compounds and adhesives shall not exceed the limits specified below:

Volatile Organic Compounds	0.5 tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits shall be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in condition number 3.C.5. (9 VAC 5-50-260, 9 VAC 5-80-110 and Condition 19 of the 7/21/04 permit)

3.C.9. **Emission Limits** - Facility-wide emissions shall not exceed the limits specified below:

Volatile Organic Compounds	77.9 tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits shall be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in condition number 3.C.3, 3.C.4, and 3.C.5.
(9 VAC 5-50-260, 9 VAC 5-50-180, 9 VAC 5-80-110 and Condition 20 of the 7/21/04 permit)

3.C.10. **Visible Emission Limit** - Visible emissions from the grinding, gel coating, and lay-up areas shall not exceed 5% opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-50-80, 9 VAC 5-50-260 and Condition 21 of the 7/21/04 permit)

3.C.11. **Stack Height -** The gel coat room and lamination area stacks shall be at least 40 feet tall, in order to comply with ambient air quality standards for Styrene.
(9 VAC 5-80-1120, 9 VAC 5-80-1180, 9 VAC 5-80-110 and Condition 23 of the 7/21/04 permit)

D. Monitoring and Recordkeeping

3.D.1. **Visual observations** - The permittee shall perform periodic visual evaluations on the grinding room stack once each calendar week while operating. If such periodic evaluations indicate any opacity condition, the permittee shall take appropriate action to correct the cause of the opacity such that no visible emissions exist. If such corrective action fails to correct the problem, the permittee shall conduct a visible emissions evaluation (VEE) utilizing EPA Method 9 (reference 40 CFR 60, Appendix A). The permittee shall maintain a log to demonstrate compliance with this condition. The log shall include the date and time of the observations, the observer's name, whether or not there were visible emissions, any VEE recordings and any necessary corrective action. If the equipment has not been operated during the week, it shall be noted in the logbook that the equipment was not operated and that a visual observation was not required. The logbook shall be kept at the facility and available for inspection by the DEQ for the most recent 5 year period.
(9 VAC 5-80-110 E)

3.D.2. **Recordkeeping** - The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Tidewater Regional Office.. These records shall include, but are not limited to:

a. Records to demonstrate compliance with Condition 3.C.1.

b. Annual throughput of gel coats, calculated monthly as the sum of each consecutive 12-month period.

c. Annual throughput of resins, calculated monthly as the sum of each consecutive 12-month period.

d. Annual throughput of patching compounds and adhesives, calculated monthly as the sum of each consecutive 12-month period.

e. Material Safety Data Sheets (MSDS) or other vendor information showing VOC content, toxic compound or HAP content for each material used.

f. Monthly and annual emissions (in pounds or tons) of VOCs, Styrene, and Methyl Methacrylate. Annual emissions shall be calculated monthly as the sum of each consecutive 12-month period.

g. Visual observation logs for the grinding room.

Records of the following should be kept for each operation: Boat Manufacturing Operations and Reinforced Plastic Composite Production Operations -

h. Monthly throughput of open molding production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat and the weighted-average organic HAP contents for each operation, expressed as weight-percent. For open molding production resin and tooling resin, record the amounts of each applied by atomized and non-atomized methods.

i. Monthly - Actual operation organic HAP emission factors, weighted-average emission limits, and actual weighted average organic emission factors for each open molding type of operation used in the past 12 months.

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.
(9 VAC 5-50-50, 9 VAC 5-60-100, 9 VAC 5-80-110 and Condition 24 of the 7/21/04 permit)

E. Testing

3.E.1. **Testing/Monitoring Ports** - The permitted facility shall be constructed so as to allow for emissions testing upon reasonable notice at any time, using appropriate methods. This includes constructing the facility such that volumetric flow rates and pollutant emission rates can be accurately determined by applicable test methods and providing stack or duct that is free from cyclonic flow. Test ports shall be provided when requested.
(9 VAC 5-50-30 F, 9 VAC 5-80-110 and Condition 22 of the 7/21/04 permit)

3.E.2. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
VOC	EPA Methods 18
Styrene	EPA Method 18
Methyl Methacrylate	EPA Method 18
PM/PM-10	EPA Method 5, 17
Visible Emission	EPA Method 9

(9 VAC 5-80-110)

F. Reporting

3.F.1. **Semi-Annual Reports** - The permittee shall submit compliance reports to the Director, Tidewater Regional Office within 30 days after the end of each semi-annual period. The compliance report shall include the following:

a. Company name and address.

b. A statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the report.

c. The date of the report and the beginning and ending dates of the reporting period.

d. A description of any changes in the manufacturing process since the last compliance report.

e. A statement or table showing, for each regulated operation, the applicable organic HAP content limit, application equipment requirement, or the HAP emission factor averaging, depending on how you plan to show compliance. The statement or table must also show the actual weighted-average organic HAP content or weighted-average HAP emission limit of emission factor(if applicable) for each operation during each of the rolling 12-month averaging periods that end during the reporting period.

f. If you were in compliance with the emission limits and work practice standards during the reporting period, you must include a statement to that effect.

g. If you deviated from an emission limit or work practice standard during the reporting period, you must also include the information listed below:

(i) A description of the operation involved in the deviation.

(ii) The quantity, organic HAP content, and application method (if relevant) of the materials involved in the deviation.

(iii) A description of any corrective action you took to minimize the deviation and actions you have taken to prevent it from happening again.

(iv) A statement of whether or not your facility was in compliance for the 12-month averaging period that ended at the end of the reporting period.

One copy of the semi-annual report shall be submitted to the U.S. Environmental Protection Agency at the address listed below:

Associate Director
Office of Air Enforcement (3AP10)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

(9 VAC 5-50-50, 9 VAC 5-60-100, 9 VAC 5-80-110 and Condition 25 of the 7/21/04 permit)

4. Insignificant Emission Units

The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
B01	Crown Boiler Model BDS-236LC Serial Number B000238949	9 VAC 5-80-720 C	PM_{10}, SO_2, NO_x, CO, VOC	0.236 MMBtu/hr
B02	Crown Boiler Model BDS-236LC Serial Number B000236319	9 VAC 5-80-720 C	PM_{10}, SO_2, NO_x, CO, VOC	0.236 MMBtu/hr
B03	Crown Boiler Model BDS-236LC Serial Number B000238948	9 VAC 5-80-720 C	PM_{10}, SO_2, NO_x, CO, VOC	0.236 MMBtu/hr
B04	Crown Boiler Model BDS-236LC Serial Number B000238950	9 VAC 5-80-720 C	PM_{10}, SO_2, NO_x, CO, VOC	0.236 MMBtu/hr
B05	Crown Boiler Model BDS-236LC Serial Number B000236320	9 VAC 5-80-720 C	PM_{10}, SO_2, NO_x, CO, VOC	0.236 MMBtu/hr
B06	Crown Boiler Model BDS-236LC Serial Number B000236318	9 VAC 5-80-720 C	PM_{10}, SO_2, NO_x, CO, VOC	0.236 MMBtu/hr

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

5. Compliance Plan

None Required – Section not Applicable

6. Permit Shield & Inapplicable Requirements

Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit.

Citation	Title of Citation	Description of Applicability
None listed in application		

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law.
(9 VAC 5-80-140 and 9 VAC 5-80-110)

7. General Conditions

A. Federal Enforceability

All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.
(9 VAC 5-80-110 N)

B. Permit Expiration

This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete application for renewal to the Department consistent with the requirements of 9 VAC 5-80-80, the right of the facility to operate shall be terminated upon permit expiration.

7.B.1. The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.

7.B.2. If an applicant submits a timely and complete application for an initial permit or renewal under this section, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9 VAC 5 Chapter 80, until the Board takes final action on the application under 9 VAC 5-80-150.

7.B.3. No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9 VAC 5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9 VAC 5 Chapter 80.

7.B.4. If an applicant submits a timely and complete application under section 9 VAC 5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9 VAC 5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.

7.B.5. The protection under subsections F 1 and F 5(ii) of section 9 VAC 5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section 9 VAC 5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.

(9 VAC 5-80-80 B, C and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)

C. Recordkeeping and Reporting

7.C.1. All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:

a. The date, place as defined in the permit, and time of sampling or measurements.

b. The date(s) analyses were performed.

c. The company or entity that performed the analyses.

d. The analytical techniques or methods used.

e. The results of such analyses.

f. The operating conditions existing at the time of sampling or measurement.

(9 VAC 5-80-110 F)

7.C.2. Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

(9 VAC 5-80-110 F)

7.C.3. The permittee shall submit a semi-annual monitoring report of the results of monitoring contained in any applicable requirement to DEQ no later than March 1 and September 1 of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31.

b. All deviations from permit requirements. For purposes of this permit, deviations include, but are not limited to:

(i) Exceedance of emissions limitations or operational restrictions;

(ii) Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or compliance assurance monitoring which indicates an exceedance of emission limitations or operational restrictions; or,

(iii) Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.

c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semi-annual reporting period."

(9 VAC 5-80-110 F)

D. Annual Compliance Certification

Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than March 1 each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

7.D.1. The time period included in the certification. The time period to be addressed is January 1 to December 31.

7.D.2. The identification of each term or condition of the permit that is the basis of the certification.

7.D.3. The compliance status.

7.D.4. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance.

7.D.5. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period.

7.D.6. Such other facts as the permit may require to determine the compliance status of the source.

7.D.7. One copy of the annual compliance certification shall be sent to EPA at the following address:

Clean Air Act Title V Compliance Certification (3AP00)
U. S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029.

(9 VAC 5-80-110 K.5)

E. Permit Deviation Reporting

The permittee shall notify the Director, Tidewater Regional Office within four daytime business hours after discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to General Condition 7.C.3 of this permit.
(9 VAC 5-80-110 F.2 and 9 VAC 5-80-250)

F. Failure/Malfunction Reporting

In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall, as soon as practicable but no later than four daytime business hours after the malfunction is discovered, notify the Director, Tidewater Regional Office by facsimile transmission or telephone of such failure or malfunction and shall within 14 days of discovery provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Director, Tidewater Regional Office.
(9 VAC 5-20-180 C)

G. Severability

The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.
(9 VAC 5-80-110 G.1)

H. Duty to Comply

The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.
(9 VAC 5-80-110 G.2)

I. Need to Halt or Reduce Activity not a Defense

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
(9 VAC 5-80-110 G.3)

J. Permit Modification

A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9 VAC 5-80-50, 9 VAC 5-80-1100, 9 VAC 5-80-1790, or 9 VAC 5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios.
(9 VAC 5-80-190 and 9 VAC 5-80-260)

K. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege.
(9 VAC 5-80-110 G.5)

L. Duty to Submit Information

7.L.1. The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality. (9 VAC 5-80-110 G.6)

7.L.2. Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G. (9 VAC 5-80-110 K.1)

M. Duty to Pay Permit Fees

The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-300 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-350. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the Department by April 15 of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department.
(9 VAC 5-80-110 H and 9 VAC 5-80-340 C)

N. Fugitive Dust Emission Standards

During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:

7.N.1. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;

7.N.2. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;

7.N.3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or other similar operations;

7.N.4. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,

7.N.5. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

(9 VAC 5-50-90)

O. Startup, Shutdown, and Malfunction

At all times, including periods of startup, shutdown, soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
(9 VAC 5-50-20 E)

P. Alternative Operating Scenarios

Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1.
(9 VAC 5-80-110 J)

Q. Inspection and Entry Requirements

The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:

7.Q.1. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.

7.Q.2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.

7.Q.3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.

7.Q.4. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9 VAC 5-80-110 K.2)

R. Reopening For Cause

The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F.

7.R.1. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit.

7.R.2. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

7.R.3. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.

(9 VAC 5-80-110 L)

S. Permit Availability

Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.
(9 VAC 5-80-150 E)

T. Transfer of Permits

7.T.1. No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.
(9 VAC 5-80-160)

7.T.2. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.
(9 VAC 5-80-160)

7.T.3. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200.
(9 VAC 5-80-160)

U. Malfunction as an Affirmative Defense

7.U.1. A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the requirements of paragraph 2 of this condition are met.

7.U.2. The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:

a. A malfunction occurred and the permittee can identify the cause or causes of the malfunction.

b. The permitted facility was at the time being properly operated.

c. During the period of the malfunction the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.

d. The permittee notified the board of the malfunction within two working days following the time when the emission limitations were exceeded due to the malfunction. This notification shall include a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notification may be delivered either orally or in writing. The notification may be delivered by electronic mail, facsimile transmission, telephone, or any other method that allows the permittee to comply with the deadline. This notification fulfills the requirements of 9 VAC 5-80-110 F.2.b to report promptly deviations from permit requirements. This notification does not release the permittee from the malfunction reporting requirement under 9 VAC 5-20-180 C.

e. In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof.

f. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any applicable requirement.

(9 VAC 5-80-250)

V. Permit Revocation or Termination for Cause

A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe any permit for any of the grounds for revocation or termination or for any other violations of these regulations.
(9 VAC 5-80-190 C and 9 VAC 5-80-260)

W. Duty to Supplement or Correct Application

Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.
(9 VAC 5-80-80 E)

X. Stratospheric Ozone Protection

If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.
(40 CFR Part 82, Subparts A-F)

Y. Asbestos Requirements

The permittee shall comply with the requirements of National Emissions Standards for Hazardous Air Pollutants (40 CFR 61) Subpart M, National Emission Standards for Asbestos as it applies to the following: Standards for Demolition and Renovation (40 CFR 61.145), Standards for Insulating Materials (40 CFR 61.148), and Standards for Waste Disposal (40 CFR 61.150).
(9 VAC 5-60-70 and 9 VAC 5-80-110 A.1)

Z. Accidental Release Prevention

If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.
(40 CFR Part 68)

AA. Changes to Permits for Emissions Trading

No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.
(9 VAC 5-80-110 I)

BB. Emissions Trading

Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:

7.BB.1. All terms and conditions required under 9 VAC 5-80-110, except subsection N, shall be included to determine compliance.

7.BB.2. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.

7.BB.3. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.

(9 VAC 5-80-110 I)

8. State-Only Enforceable Requirements

The following terms and conditions are not required under the federal Clean Air Act or under any of its applicable federal requirements, and are not subject to the requirements of 9 VAC 5-80-290 concerning review of proposed permits by EPA and draft permits by affected states.

8.A.1. **Odor** - 9 VAC 5 Chapter 40, Article 2 and 9 VAC 5 Chapter 50, Article 2.

8.A.2. **Toxic Pollutants** - 9 VAC 5 Chapter 60, Articles 4 & 5.

(9 VAC 5-80-110 N and 9 VAC 5-80-300)